



U.S. Department of Justice

United States Attorney
Southern District of New York

The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007

September 14, 2021

MEMO ENDORSED

BY ECF

The Honorable Colleen McMahon
United States District Court
Southern District of New York
United States Courthouse
500 Pearl Street
New York, New York 10007

Re: *United States v. Ramon Solla*, 19 Cr. 740 (CM) *Case Adj to Nov. 18, 2021 at 11 AM, for a final pretrial conf. The proposed schedule for in limine motions is acceptable to the Court Time Excluded through the trial date (Dec 7, 2021), for the*

Dear Judge McMahon:

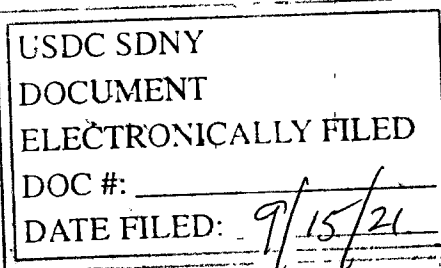
The parties respectfully submit this joint letter regarding the pretrial motion and conference schedule in the above-referenced case. Trial has been scheduled to begin on December 7, 2021. Assuming that date remains firm, the parties jointly propose that motions *in limine* be due on October 26, 2021, with opposition due November 9, 2021. The parties likewise request a final pretrial conference for November 23, 2021, and request that the conference presently scheduled for September 21, 2021 be adjourned. *disposition of trial dates and in the interest of justice.*

Additionally, the Government requests the exclusion of time under the Speedy Trial Act from September 21, 2021 until December 7, 2021. The exclusion is in the interest of justice because it will allow the defense to continue preparing for trial and for filing the above-referenced motions. Counsel Donald Yannella, Esq., and Elizabeth Macedonio, Esq., consent to the exclusion of time through the trial date.

Respectfully submitted,

AUDREY STRAUSS
United States Attorney

By: /s/
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Cc: Counsel of record (by ECF)